

Exhibit M

Megann Waugh

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
MEGANN WAUGH**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

MEGANN WAUGH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 15 Courtland Lane, Aberdeen, New Jersey 07747.

2. I am currently 53 years old, having been born on September 27, 1968.

3. I am the wife of John (“Jack”) Waugh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On March 29, 2017, my husband Jack died from brain cancer at age 50. It was determined by the World Trade Center Health Program that Jack’s cancer was causally connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I were together for 27 years, and did everything together. Jack was definitely an adventurer. Wherever we went, he always knew somebody, and if he didn’t know them, he was best friends with them by the time we left. The beach was our favorite place for sure. We would go in winter, spring, summer, or fall. It didn’t matter to us. We also loved to travel and would often have extended family members join us on vacation. Jack’s strengths were my weaknesses. We sort of balanced each other out. He was the calm, and I was more of the

storm. Nothing really ruffled his feathers. He was my everything. I'm a lucky woman to have been his wife. I wish I married him when I was three and that still wouldn't have been enough time. The life I have now was not supposed to be my forever. Jack was my forever, and I never envisioned it any other way. My forever is wherever he is. But for now, I just have to stay here, raise my little girl, and wait until I get to be with him again. My daughter, Charlotte, is now 10 years old. We had hoped and prayed for her almost 15 years. And finally, when our dream came true, Jack got sick.

6. After seeing his union president on the news once the planes hit the towers on 9/11, Jack immediately volunteered to help with the relief effort at Ground Zero. He was actively working to remove iron and steel mangled in the pile so police could bring in search dogs and look for survivors. He believed it was the right thing to do to help as much as possible in the face of tragedy. One day, as he was walking from the Javits Center to Ground Zero, a little girl snuck under a barrier and ran to him to give him a gift describing what a hero is. It really touched him. It still hangs in our house to this day.

7. I'll never forget the day I first learned of Jack's health problems. It was December 8, 2014. I was at work and received a call saying that Jack had suffered a seizure while his crew was working on a bridge. My girlfriend drove me to Staten Island University Hospital, where Jack was given a brain MRI, which revealed a mass. Once it was determined that he had cancer, we went to Columbia Presbyterian where Jack underwent brain surgery.

8. After his discharge from the hospital, we visited with his neurooncologist, who developed Jack's treatment plan. The brain tumor had completely impaired his vision so I had to do all of the driving. He described everything as dark, no matter what time of day it was. One day, he was coming towards me in the kitchen but couldn't see me. He accidentally took me down with his shoulder. It broke my heart to see him that way. Eventually, he regained some of his sight but had lost all of his peripheral vision. He began suffering from intense headaches, which further affected his vision.

9. Jack underwent radiation treatments from January 20, 2015 until March 11, 2015. He was also required to take a chemo pill for five days before undergoing MRIs. Miraculously, on March 18, 2015, Jack's scan was clear, but they continued to monitor him. He seemed to be doing well. Then, in September 2015, something showed up on a scan. As a result, he had to go

every other Friday to receive an Avastin infusion in his arm. We were living MRI to MRI, but always remained optimistic. Jack tried to live every day as normally as possible and continued to walk to the gym to work out. We had always planned on Jack's early retirement so we could do family things and enjoy our time with Charlotte. We had a little piece of it, just not as long as we had hoped. I'm more than grateful for the time we had. As his illness progressed, every morning I would drop Jack and Charlotte off at my sister's house. She would drive them to Charlotte's preschool so Jack would have a chance to walk her into school every day. We wanted her to have those memories of her dad.

10. I was working as a teacher when Jack was diagnosed. I was able to use sick days and stay home when needed to take Jack to all of his treatments and chemotherapy. We would drive Charlotte to school before he would head to his treatments. We decided to treat some of his treatment days like a date day. Jack and I would drive down the parkway, play music in the car, and then on the way home we'd stop at the beach and have a special lunch. We tried to make each day as special as possible. It was stressful for me though, because I just wanted him to have the best treatment possible so he could get well. I would pray every day that I could help him. We always believed we could get through it. With the help of my sister and Jack's parents, we had a lot of support so Jack wasn't alone all that much. He and I tried to create great memories and just live our lives.

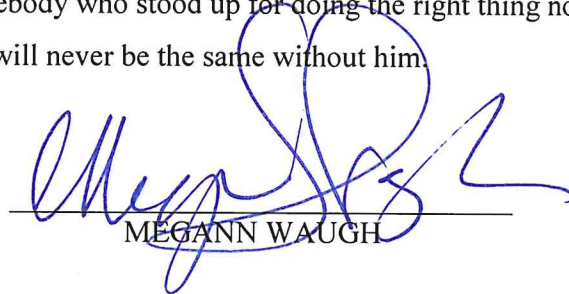
11. Charlotte was just two years old when Jack was diagnosed. She recently told me that she misses her daddy and wishes that he was able to see her perform at her dance competition. She commented that he was there watching from heaven. That emotionally touched me. I really believe that Charlotte sees him and feels him. It's comforting in a way.

12. Regarding his cancer, Jack never said "why me?" Instead, he'd always say, "why not me?" He was an amazing man who always maintained a positive attitude. He'd always say that we could get through anything together "because we're Jack and Meg." I'm thankful and grateful for having Jack in my life. I wish we could have sailed off into the sunset together.

13. Fortunately, we were somewhat prepared for this medical emergency. In part, because we never overspent and lived within our means. Jack collected some disability, although it wasn't significant. Ultimately, the biggest impact was the fact that Jack's cancer treatment forced him into an early retirement. In fact, had Jack never gotten cancer, he likely would have

been assigned to be the foreman and ‘working boss’ on the Hudson Yards project in Manhattan. That would have paved the way for our retirement. Unfortunately, Jack knew in his heart that he wouldn’t be able to get back on the iron. This was very hard on Jack emotionally because, as a man, you want to earn your money and put your heart and soul into your career. Clearly, we were impacted because of the loss of Jack’s future earnings. However, I’m thankful that we were responsible financially and I could still take good care of our daughter.

14. My husband went down to Ground Zero because it was the right thing to do. He wasn’t paid to do that work – he volunteered to do it. For me, this case isn’t about money, because no amount of money can bring back my husband. We waited so long to have our little girl. Jack had dreams of Charlotte before she was born. He wanted to be a good father and teach her how to surf. I’m glad that God gave him a little glimpse of what she was like, but I’m in tears knowing that he isn’t here to watch his daughter grow up. What’s most important to me is that our daughter understands her father was somebody who stood up for doing the right thing no matter what. We miss Jack a lot and our life will never be the same without him.



MEGANN WAUGH

Sworn to before me this
21 day of April, 2022



Notary Public

Bernadette B Lopez
Notary Public
New Jersey
My Commission Expires 8-15-2022
No. 2424061

Roberta Waugh

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
ROBERTA WAUGH**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

ROBERTA WAUGH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 113 Grand View Drive, Toms River, New Jersey 08753.
2. I am currently 81 years old, having been born on January 26, 1941.
3. I am the mother of John “Jack” Waugh, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My son passed away from brain cancer on March 29, 2017, at the age of 50. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Jack and I were always very close. He was a wonderful son who would never miss a family function and was often active in planning the next big celebration. My husband and I were overjoyed to see Jack get married. Since Jack was an avid sports fan and baseball player, we would often go to watch him play. We were fortunate to see each other at least once a week because we lived close by, enjoyed the holidays as a family, and were able to vacation in a summer resort town in Long Beach Island. After Jack met his wife, Megann, she and I became very close and remain close to this day. I stood by my son and his wife as they went through the process of in-vitro and adoption, and were overjoyed when they brought home their daughter, Charlotte.

6. Jack had a successful career as an ironworker. Along with my husband, Jack's work helped shape the NYC skyline. After 9/11, Jack put his construction knowledge to work and volunteered to assist in the relief and recovery efforts following the terrorist attacks. Because he was an ironworker, he knew what to look for and how to help people. My son went down to the World Trade Center without taking any issue or thought as to how he might be hurt. Despite the treacherous working conditions, including toxic dust visibly floating in the air, Jack continued to work there for over a week.

7. Following a seizure while at work on the Bayonne Bridge, I received a shocking phone call saying that Jack was hospitalized. Shortly afterward, Jack had an MRI, which showed what was believed to be a tumor. The cancer was later confirmed after we were able to obtain an appointment with a specialist in brain surgery. When people described the type of cancer Jack had, I didn't even look it up on the computer feeling that it would be too painful to learn how bad things might be. My sense was always that my son would be strong enough to beat it. I didn't realize how serious the type of cancer he had was. Following the surgery, Jack was doing really

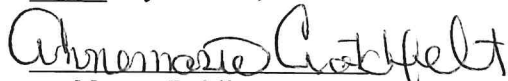
well for a time. We were pleased with the surgeon, Dr. Raval, at Monmouth Medical Center in New Jersey, and for a time, the chemotherapy was going well. In fact, on Fridays I would accompany Jack to his chemotherapy treatments because his wife was working as a teacher and had to be at school. Jack was such a kind and warm person. When he would go in for chemo, the nurses loved to see us come in because, while the clinic could be a sad place, he made them laugh. For example, upon seeing an ocean scene on the hospital wall, which reminded him of trips to Mexico with his wife, Jack would quip, “well Mom ... do we have the Cabo suite today?”

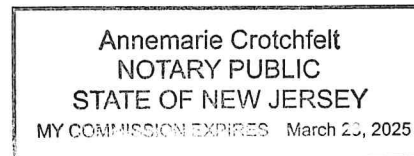
8. After I received the news about Jack’s cancer diagnosis, and since he’s been gone, I haven’t been the same person for sure and look at things differently after the loss of a child. In the year before he passed away, I can see that Jack’s gait had changed and noticed something was happening on his left side. It was incredibly painful having to face up to the fact that my son’s cancer was growing. We tried to live as normally as we could and be optimistic; although, it became difficult as the cancer progressed. Somebody always had to be home for Jack while he was sick, and my husband and I tried to help as much as possible with Jack’s care. When Megann was working, my husband would be sure to be at the house. Then, around December 2016, Megann stopped working to spend more time taking care of him. Eventually, Megann arranged for an aide to help Jack around the house because his symptoms became so severe that he was losing his abilities physically. I also found that Jack was losing his mental abilities too. I noticed he was repeating himself, which really killed me as a parent to have to see that. Seeing Jack in so much pain was truly awful; although, it was also stressful and draining to try to hide from Jack that we were aware of the extent of his decline.

9. Jack's work after 9/11 was a selfless and noble act of courage. He didn't think of anything but going down to help people. I believe this makes Jack an understated hero who was a wonderful kid. I miss him terribly.


ROBERTA WAUGH

Sworn to before me this
15th day of June, 2022


Notary Public



Estate of Charles Richard Gunzelman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
JOANNE T. ALCABES

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JOANNE T. ALCABES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 51 Halley Drive, Blue Point, New York 11772-6515.

2. I am currently 72 years old, having been born on September 21, 1949.

3. I am the sister of Charles Richard Gunzelman, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.

4. Charles passed away from lung cancer on May 31, 2015, at the age of 59. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On June 25, 2015, I was issued Letters Testamentary on behalf of my brother's estate by the Chenango County, New York Surrogate's Court.

6. Charles was seven years my junior, but we were always very close. We shared a really nice, loving, and kind relationship. We grew up in an apartment in Brooklyn, New York. While my mother would go shopping, we would watch TV together. I smile when I think about the times Charles would be eating Oreos while we watched TV. Somehow, he always found the stash of cookies before I did. Our family eventually moved to Bethpage, and I would watch Charles after school when our parents were out of the house. After I got married, my husband taught Charles all about mechanics. I used to bring them coffee while they worked in the garage. My brother continued to live in Bethpage, and we would see each other a lot during that time. In 2005, after his retirement, Charles moved to McDonough in upstate New York, at which point it was more difficult to meet quite as often. On the bright side, every time I would visit Charles upstate, it was a real treat because there were many fun activities to do. Charles loved spending time with my children. They always had fun going snowmobiling in the winter. I'm glad that Charles was present with the kids as much as possible. Since Charles never had children of his own, he was very good to my four sons. Remarkably, I now have eleven grandchildren. He used to take my kids to Six Flags and ride on the rollercoasters with them. He took them on other outings as well. He was a special guy, who died way too young. After Charles became ill, we spoke more frequently, and I would go up to visit on weekends. During his battle with cancer, I tried to convince him to move back to Long Island, but he preferred to remain upstate, where it was quiet.

7. As an NYPD Sergeant, Charles worked on the rescue and recovery effort following the September 11, 2001 attacks. He never spoke much about his experience. He did, however, say that the things he saw at Ground Zero were quite chilling and terrible. After he completed the 9/11 recovery work at the World Trade Center site, Charles retired on May 1,

2002. Following retirement, Charles worked as a mechanic in Brightwaters while living at my mother's home in Bethpage. From there, he stopped working and moved upstate.

8. Sometime around 2013, I received a call from my brother explaining that he was having problems with congestion and sinus infections. After he visited with a number of doctors, Charles called me on June 6, 2014, explaining that he saw a doctor in Cooperstown, who informed him that he had Stage IV cancer, and that he was in the hospital. Alarmed by the news, my husband and I drove up to visit him in the hospital the next morning. It was so upsetting to know my brother was so sick. On one of the visits to the hospital, the doctor pulled me aside and told me that I had to pull it together for Charles because he was going to need me. And that's exactly what I did. Upon being released from the hospital, my brother was prescribed a regimen of chemotherapy treatments, which started to impact his quality of life. As a mechanic, Charles used to take care of all the work on his truck by himself. Suddenly, it became difficult for him to take care of basic maintenance, let alone complicated repairs. Since the treatments were in Cooperstown, it was impossible for him to drive back and forth in his condition. Even though I was working full-time, I made time to visit my brother every weekend and would help him attend his chemotherapy appointments.

9. The last year of his life was particularly hard because he needed a wheelchair. At 58 years old, he didn't want to be in a wheelchair. Hoping his condition would improve, Charles replaced his old truck with a brand new one. Sadly, he never had much of a chance to enjoy it. At the time he passed away, the truck's odometer read less than 700 miles. Essentially, having once been a very independent person, Charles could do little else than sit on his porch, assisted by his oxygen tank to help him breathe. Since Charles had friends in the area, we paid them to keep an

eye on him during the week and to assist him by making sure his oxygen was connected as he moved around the house.

10. I went to visit Charles for his birthday on May 18, 2015. Considering the circumstances, he was in good spirits. We even played some cards. On my way back home, after already driving nearly five hours, I received a call from Charles's friend who said, "We're in the hospital." Since my brother seemed fine just hours before, I was very puzzled. Nevertheless, I turned around and started the long drive back upstate to the hospital. When I arrived, Charles told the nurses that he was not ready to implement the DNR order. He was suffering day after day. The doctor showed me the imaging of the lungs, which showed how the far the cancer had spread. As he continued to suffer, he was unable to speak. Eventually, with nobody else there, Charles wrote me a note that simply said, "Please let me go." I rushed the note to the doctor but was told that they could not accept the note alone as authority. As a result, they reduced his morphine drip. After a number of witnesses entered the room, he said, "Let me go." I invited a few of Charles' friends to say their final goodbyes. Within ten minutes of taking him off of life support, my brother was gone. Charles was a good guy, and he died way too young.

11. As Charles battled his cancer, I could visibly see how his pain worsened every single day. Eventually, he was no longer able to walk. And of course, he was no longer able to drive, which was really crushing to him after he got the new truck. Charles also had to suffer through a myriad of medications, including morphine for the pain, which became difficult to track. I can't even remember all the medications he was on because there were so many. As Charles underwent more treatments, he had difficulty sleeping. Since he had to keep part of his body elevated, he couldn't sleep in a regular bed. His breathing became increasingly labored. He couldn't breathe without the support of an oxygen machine, which needed constant adjustments.

My brother suffered quite a bit, especially during the last two months of his life. At that time, it was very uncomfortable for him to walk due to an edema in the legs. In fact, there was so much swelling that his legs were hard as a rock. Since Charles had so much pressure on his lungs, he easily became short of breath. Even just taking a trip to the bathroom required a huge effort. I could see that it became difficult for my brother, a once strong and independent person, to lean on others to take care of simple things, such as washing his clothes or helping him walk into the shower.

12. It was apparent that Charles was extremely depressed. After moving upstate, Charles felt he would enjoy his life. When he was suddenly stricken with cancer, he went through a stage of frustration, often asking himself, "Why did this have to happen to me?" While he was undergoing chemotherapy, my brother said to me, "All I'm asking for is to be able to sit out on my front porch and watch the cars pass by." Charles was a quiet man, who wasn't greedy and simply wanted to enjoy his retirement. Since the remaining year of his life was spent struggling through agonizing treatments and medicines, I know that my brother was disappointed that he never had the chance to enjoy life as he had planned.

13. Charles didn't expect to die at age 59. I would speak to my brother after dinner each night for an hour, sometimes two. Looking back on those many conversations we had, I know he was very depressed about his condition and the limitations it imposed upon him. He didn't want to die knowing he had so much to live for.

14. I think in the beginning that my brother was in denial as to the severity of his cancer. Once the chemotherapy started, Charles became a little more withdrawn and began to feel he was losing the battle. I know he must have been demoralized because he always took pride in keeping his home immaculate. But toward the end of his life, he couldn't even push a

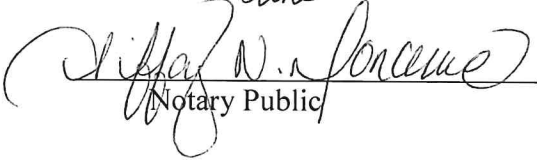
broom. Charles tried to fight the cancer as best he could. However, in the two weeks before he passed away, after lying in bed for so long, he said, "Please don't let me live like this...it's not really living."


JOANNE T. ALCABES

Sworn to before me this

4 day of ~~May~~, 2022

June


Notary Public



Estate of Keith Owen Henry

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
PATRICIA MAE BUDD-STEWART**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MARYLAND)
: SS.:
COUNTY OF PRINCE GEORGE'S)

PATRICIA MAE BUDD-STEWART, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 9219 Goldenrod Lane, Upper Marlboro, Maryland 20772.

2. I am currently 78 years old, having been born on November 29, 1943.

3. I am the mother of Keith Owen Henry, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my son's estate.

4. Keith passed away from multiple myeloma on November 13, 2015, at the age of 55. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 21, 2015, I was issued Letter of Administration on behalf of my son's estate by the State of Maryland, Prince George's County Register of Wills.

6. Growing up, Keith was a regular boy doing regular activities. When he became of age, after high school, he went into the Army. After he was discharged, he moved to Brooklyn, New York. I would not see him as often as I would have liked because he would be working. But we would still spend time together on holidays. We would also talk on the phone all the time to replace the time apart. Throughout his adulthood, we remained very close. I also know that he was close to his sisters.

7. In the aftermath of the September 11, 2001 attacks, my son Keith assisted with the cleanup efforts on the ground. He would complain about the fumes and dust he was breathing. He would tell me on the phone about his superiors having better quality masks than him. I would advise him to put on two masks instead of one. I even suggested that he buy masks from the drugstore himself. He also mentioned several times that they would find bodies while cleaning up. On several occasions, he went to the hospital because he felt sick. He would dismiss my worries and tell me that it was nothing. Keith stayed on the grounds until the clean-up was completed.

8. After he had completed his job, he would constantly complain of headaches. He even called me once to tell me that he had fallen while crossing the street in New York. I was worried and recommended he go to the hospital. Unfortunately, he was not treated very well at the hospital and was reticent to go again. He later also complained about breathing problems.

9. At that point, I wanted him to move to Maryland where his sister and I were based. He kept on going to work even though he was suffering. It took us months to convince him to move to Maryland. His illness was getting worse. He was not eating; he was constantly vomiting.

10. When I went to New York to bring him back to us, I understood the extent of his state. He couldn't breathe properly, couldn't urinate properly. He was also having diarrhea. His whole body was swollen. He suffered a lot. There wasn't a day he wasn't in pain. Pain killers took the edge off but not completely.

11. We finally were able to get him to the hospital where I used to work as a medical secretary. My son Keith had insurance with his job that only lasted for sixty or ninety days after he stopped working. After that, he was paying out of pocket for his medical treatment. We were in and out of the hospital from the very beginning. He would even sometimes stay for two, three weeks on end. He would get different tests, time and time again, from the different hospitals and doctors.

12. When he was diagnosed with cancer, he started his chemotherapy in Washington DC. I would accompany him and anxiously wait for him to finish his treatment. Similarly, he eventually had to undergo kidney dialysis three times a week: Mondays, Wednesdays, and Fridays. I would often accompany him as well.

13. All of this took a toll on him, physically and emotionally. My son Keith, once very healthy and happy, was unrecognizable. The illness had beaten him up to a point where he felt whipped. I was always taking care of him, and this bothered him a lot. He would tell me that it was him who was supposed to take care of his aging mother. He would also feel embarrassed when I would help him take a bath. I cannot imagine how hard this was on his general mental state.

14. This also caused him to become more isolated and more irritable. My son was always cracking jokes and now he was just alone and dying. Unfortunately, not many friends

and colleagues visited him during his illness, and this played a role in his withdrawal and irritability.

15. The pain from his cancer was very severe because it mainly touched the bones. He would not sleep at night from the pain. I'd wake up and see him through the open bedroom door sitting on the couch. I also feel that he would not sleep in order to avoid dreaming of what he had seen during the clean-up mission.

16. He would never talk about the things he had seen. But we did feel that it was something that weighed heavily on him and that exacerbated his physical suffering.

17. My son Keith had always been healthy. Out of the blue, with not only the things he had seen but also the toxic substances he had inhaled and was exposed to, he became severely ill and was not only physically disappearing but also mentally. Whatever happened during the cleaning of Ground Zero took my son away.


PATRICIA MAE BUDD-STEWART

Sworn to before me this
27 day of May, 2022



Notary Public

Antwannette C Welch
NOTARY PUBLIC
Prince George's County, Maryland
My Commission Expires 9/16/2025

**MARYLAND NOTARY ACKNOWLEDGEMENT
(OATH OR AFFIRMATION SHORT FORM)**

State of Maryland
County of Prince Georges (or City of Baltimore), to wit:

Sworn to and subscribed before me by Patricia Stewart
[name of person(s) swearing] this 27 day of May, 2022.

[Notary Seal]
Public]

A. Welch
[Signature of Notary]

Antwannette C Welch
NOTARY PUBLIC
Prince George's County, Maryland
My Commission Expires 9/16/2025

Antwannette C. Welch
[Printed Name of Notary Public]
Notary Public
My Commission Expires: 9/16/2025

Nancy Alicia Humphrey

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
THOMAS HUMPHREY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

THOMAS HUMPHREY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2699 Ocean Avenue, Seaford, New York 11783.

2. I am currently 75 years old, having been born on February 22, 1947.

3. I am the husband of Nancy Alicia Humphrey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my wife's estate.

4. My wife passed away from bile duct cancer on August 28, 2015. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On March 1, 2016, I was issued Letters Testamentary on behalf of my wife's estate by the Nassau County, New York Surrogate's Court.

6. My wife and I were soulmates. Nancy was a beautiful person, inside and out. I cannot say enough good things about her. She was sensitive, funny, and smart. If I had a list of every quality I would want in a woman, Nancy possessed them all. We loved socializing with friends and family and attending business events and going dinner-dancing – the list just goes

on.

7. Nancy was the Senior Director of Marketing at Fitch Ratings, a bond rating company near Ground Zero. On September 11, 2001, she was on the 33rd floor of her building and witnessed the second plane hit the South Tower. When I was finally able to call her, I was relieved to know that she was safe. Traumatized, but safe. Nancy was running towards the Brooklyn Bridge when the second tower collapsed. She met me at my office in Long Island City, and we drove home together. Her company closed for the remainder of that week. She got called to return the following Monday, after the Environmental Protection Agency said the air was safe to breathe. She continued to work at Fitch at the same location for many years.

8. In November, of 2014, Nancy developed a pain in her abdomen. She was diagnosed with bile duct cancer. She died nine months later. The doctor said the cancer likely started a year earlier, but by the time it is detected it is usually in an advanced stage. Nancy took very good care of herself prior to her illness. She ate a very healthy diet consisting of chicken, fish, and grains. But, in the end, it didn't matter.

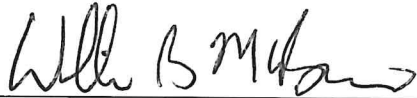
9. There weren't many treatment options available for Nancy, but she did go through chemotherapy. It was very rough on her. She had many bad days. Several times, she became jaundiced and needed to go to the hospital to have her bile ducts cleared out. She was a real trooper through all of it. I took her home and set up hospice care for her. If visitors came, she would do her best to put up a good front. Her dignity was important to her. Even when she had very little hair left, if someone came to visit her, she would fix her hair and try to look as good as she could. She took pride in that.

10. Nancy was in constant pain. She required assistance, even to walk. I would take her to the bathroom with a walker and a strap to keep her from falling. But after a while, even that became difficult. For a time, a physical therapist would come and help her do some exercises, But, Nancy didn't feel it was helping. It just caused her more pain. Four or five months before her death, she became bedridden. She had to have a catheter inserted to urinate. Morphine was administered through an IV drip, which I controlled, day or night, depending on the severity of her pain. She was on so many different medications when she died. She became emaciated. Before her illness, Nancy weighed 140 lbs. At the time of her death, she weighed 90 lbs.

11. Nancy was very worried about family coping without her. One of our grandchildren was about to receive Confirmation. Nancy was so afraid she'd miss it, which sadly she did. She would talk about all of these things in advance. She knew she was dying, but was so determined to do the right thing for all of the kids. She never wanted to accept that she was dying. She tried to keep a good outlook, especially when other people were around. She didn't want them to worry. I don't think she ever "accepted" it. She fought hard the entire time, even when she was clinging to life. I was amazed at her strength and determination, despite all of her pain.


THOMAS HUMPHREY

Sworn to before me this
25 day of May, 2022



Notary Public
WILLIAM B. McBRIDE
Notary Public, State of New York
No. 01MC6077085
Qualified in Suffolk County
Commission Expires 7/01/2022

Estate of Marion Claire Jones

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
SHAWNA J. JONES

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF BRONX)

SHAWNA J. JONES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3921 Wilder Avenue, Bronx, New York 10466.

2. I am currently 49 years old, having been born on April 9, 1973.

3. I am the daughter of Marion Claire Jones, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my mother's estate.

4. Marion Claire Jones passed away from lung cancer on September 23, 2013. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On January 8, 2014, I was issued Letters of Administration for my mother's estate by the State of New York, Bronx County Surrogate's Court.

6. I had a close relationship with my mother. We lived together. Before the lung cancer diagnosis, she had some medical problems, and I was her main caregiver. She took a fall on the ice in winter, 2000. That fall set off an unfortunate cycle of surgeries and recovery periods.

7. On September, 11 2001, my mother was in a building directly across the street from the World Trade Towers. She worked at a law firm as a chef in their cafeteria. She was on the 38th floor of her building when the planes hit. My mother said she was close enough to see the people who worked in the buildings and see what they were doing. She said she saw people hanging on to the ledges outside and blowing away, like pieces of paper. Then, she heard loud noises—it was the sound of peoples' bodies hitting the pavement. She said they splattered like water balloons. Those sounds, smells and images haunted her the rest of her life. The lights in her building went out. People helped her evacuate her building, just before the tower came down. Someone pulled her to safety, but she was breathing in the remains of the collapsed buildings from the very beginning. Eventually, she walked towards 12th avenue. Hours passed before she was able to leave the area. She got home on a bus.

8. My mother was surprised how quickly she was told to return to work. She felt like politicians were trying to set an example, sending them back so soon—to show that everything in New York City was fine. Her breathing was negatively affected as soon as she went back to work. She saw her regular doctor. He noticed the difference in her breathing right away. He told her to get an N-95 mask and make sure she wore it whenever she was downtown. She bought herself a mask and wore it to work. She would come home and tell me that her superiors were angry that she wouldn't remove the mask for work. When her co-workers also started getting shortness of breath, they were jealous that they didn't have the same protection. People actually tried to steal her mask.

9. Around Christmas, 2012, my mother was in bed, saying, "Oh my god. I can't breathe. I think I'm having a heart attack." She wasn't able to sit up. We went to the hospital, and they said that her rib was broken. My mother was baffled. After everything she went through with her health, she'd know if something was broken. The doctor thought there might be something more serious going on. They kept her in the hospital for a few days. She called me from the hospital and told me they think it might be cancer. I was absolutely shocked. My mom

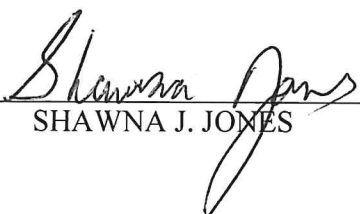
was discharged and returned home. In December, 2012, the doctors told her it was lung cancer. The location of the tumor was pressing on her rib, which explained how it broke. She had surgery to remove the tumor, followed by four or five months of chemotherapy, three times a week, five hours each session.

10. She was always hopeful that the chemo would work at first. She was upbeat. She appeared to improve—almost an “uplift” of her mood. Initially, the doctor said the treatments had worked and she was cancer free. A couple of weeks later, her prognosis totally changed. The cancer was back full-blown. We were all devastated. My mother told the doctors to do everything possible to keep her alive. She wanted to do whatever it took—to keep her alive. And, my mom was a fighter. She had been through so much already and still had the best, most positive outlook. One time, however, I remember we took her to see an air-show. When the planes started flying, her heart jumped out of her chest. She said it sounded like 9/11. What should have been a nice family outing, turned into an episode of PTSD. After 9/11, the sound of airplanes always made her nervous.

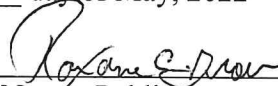
11. Ultimately, the doctors said there wasn’t much that they could do for her after the chemotherapy failed. She had already lost her hair, had no voice left, and couldn’t eat. We had to puree her food, she would fall out of bed, and she was skin and bones. Suddenly, she looked like an old woman, her face full of wrinkles. Acquaintances couldn’t recognize her. Before this, even though my mother was almost 70-years old, she never looked her age. People thought we were sisters. She took pride in that, always. At the end, she was in so much pain. I would hear her moaning.

12. We were all devastated, after trying to be hopeful and positive. My mother was upset with me. She felt I was pulling away from her. In reality, I was trying to brace myself for when the time came that I’d be living without her. The doctors said there was an experimental trial for a cancer pill, but felt her illness had progressed too far for her to try the pill. They feared it would dehydrate her and cause more harm than good. The doctor was crying while he was explaining this to my mom. This was mid-August, 2013. She was sitting in the wheelchair and she said, “I am going to die.” I could hear the finality in her voice. From then on, she was in and out of the hospital. She would have mini-strokes and wake up in the hospital and not know why she was there. She couldn’t believe that she had had a stroke or sometimes a seizure. She got

treated at the hospital but went downhill very quickly. The last time she was home, she said, "Shawna, I can't control my arm. What's happening to me?" This time, it was a full-on seizure. She was in the hospital, and she started flailing. I held her in my arms and told her it was ok. Everything was going to be ok. I held her in my arms while she passed on. I think she heard me say goodbye.


SHAWNA J. JONES

Sworn to before me this
25 day of May, 2022


Notary Public

Roxanne C. Brown
Notary Public, State of New York
No. 01BR6269354
Qualified in Bronx County
Commission Expires Sept. 24, 2024

Estate of John Frank Kristoffersen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
BERNADETTE KRISTOFFERSEN**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

BERNADETTE KRISTOFFERSEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 931 Altessa Boulevard, Melville, New York 11747.

2. My current age is 63, having been born on August 2, 1958.

3. I am the wife of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. John passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On January 29, 2013, I was appointed the personal representative of my husband's estate by the Surrogate's Court of the State of New York, Suffolk County.

6. John was the love of my life and my everything. We met in 1984 when John was training at the New York City Police Academy. I was a waitress at a nearby restaurant that John frequented. His friends told me he hated the food and only went there to see me. We got married within a year and had been together ever since. My husband was very family-oriented and loved

his children and me. We raised a beautiful son and a daughter together. He was a devoted husband and father. Our daughter had medical issues that demanded much of our attention. John made sure that her illness didn't overshadow our son's life. John spent equal time with both kids. That was very important to him.

7. John was a homicide detective for the NYPD on 9/11 but had that day off. When he saw what had happened, he went to Ground Zero the next day. He was part of the rescue and recovery effort, sifting through the debris, bringing bodies to the morgue, and going to the Staten Island landfill to dispose of the rubble. He spent weeks working down at Ground Zero and months working at the landfill.

8. Before John's 50th birthday, he went for an endoscopy, which revealed a large mass. We were referred to go to Sloan Kettering, where John was diagnosed with esophageal cancer. John was a strong man who felt he could tackle anything that came his way. He wanted to start treatment as soon as possible and move on with his life. The first step was radiation to shrink the tumor. The treatment worked, and doctors felt they would be able to surgically remove most of the tumor. The surgical procedure was intricate and invasive. In order to remove the tumor, they had to cut away the bottom portion of John's esophagus and the top portion of his stomach and then join them together. The recovery was extremely difficult, but John was a model patient. The doctors were very optimistic. A post-surgery scan was performed that came back clean. The doctor said that John was cancer-free. We were so relieved. The surgery had reduced the size of John's esophagus and stomach, so he was given strict instructions regarding his diet. He had to eat 6-8 small meals a day. Most of his food had to be pureed for easy digestion. John followed all instructions to the letter because he was looking forward to getting back to work at the NYPD.

9. On Easter Sunday, 2012, the family got together for dinner. John said he didn't feel great because his stomach was bothering him. I thought that maybe he had overeaten or eaten something that wasn't easily digestible. John was always the strong, silent type. If he didn't feel well, he'd keep it to himself. He wasn't one to complain if he had an ache or a pain. Around that time, our daughter was in Chicago and going through medical issues of her own. I flew to Chicago to be with her. When I got home about 10 days later, John was barely recognizable. His eyes were dark yellow, and he had lost a noticeable amount of weight.

10. In May 2012, John went for new scans, which showed that the cancer had metastasized to his liver. They said it had “exploded.” This was not the result we were expecting since just weeks before he was cleared to go back to work. Still, John remained optimistic. John believed he had beaten the cancer. Now, to hear that not only had it returned but spread was devastating. Both the doctors and John agreed they would take an aggressive course of treatment to stop or at least slow down the cancer. John was confident that he would beat it again, even though it had metastasized. Giving into it was not an option for John. My husband was determined that the cancer wouldn’t beat him. The plan to treat the liver cancer was an aggressive series of chemotherapy rounds.


11. Unfortunately, the treatment wasn’t working. The doctor said the cancer came back with a vengeance. He offered John the third round of chemo, but he wasn’t optimistic that the outcome would be any different. I was in John’s hospital room when a nurse came in to talk to us about hospice care. As soon as she said the word “terminal,” I abruptly told her to leave the room. That wasn’t something I wanted John to know. We always tried to shield each other and our children from anything negative, and I was going to do that for John. He knew it was bad, and he was angry. He was worried that he wouldn’t have enough time to get his affairs in order so that his family would be taken care of. It was all he thought about. I don’t think John believed he was going to die. He was a fighter and would do whatever it took to survive this. We learned of an alternative treatment clinic in Mexico that was having promising results with cancer patients. We opted to take a chance in lieu of the third round of chemotherapy. This treatment, however, wasn’t covered by insurance, and we had to pay \$30,000 out of pocket, but we were hopeful they could help.

12. Within a few days of being Mexico, John was delusional and his system started shutting down. We were advised the toxins from all the medications he was given prior to coming to Mexico were building up in his body. They advised that they would have to flush out his system to try to remove the toxins. His system was flushed out and John received transfusions of healthy blood. They put him in a hyperbaric chamber in an effort to kill the cancer cells and activate his body’s healing process. We were told that he should not take any medications for two months to allow the toxins to fully exit the body, which would allow the liver to start rejuvenating. Since there was nothing further they could do for him, the doctor

suggested we arrange for a medical transport to fly us back home as soon as possible. They gave us vitamins and some enriched blood to be injected into John. They stabilized him enough for us to take a commercial flight back to the U.S. We were met on the tarmac by an NYPD ambulance and taken immediately back to Sloan Kettering. At this point, we knew the only option was hospice, but John wanted to be at home. I arranged for a hospital bed that we set up at home. Once he was home, I could hear him moaning in pain. It was awful. I was trying to feed him, but the food just fell out of his mouth. I kept telling him, "Come on John, you've got to hold on. All you need is two months." I tried to be his strength for him. I knew I had to withhold most medications so that the toxins had a chance to leave his body. It is our only hope of him getting through it. John tried to be so strong. He didn't want morphine or pain meds. He wanted to be alert. But, it was obvious he was in great pain. My heart broke for him. He was suffering, and he couldn't take care of himself. He became so frustrated with himself, his body, and his mind. He felt like he still had so much to do. He would try to remember things like the combination to our safe because he was the only one who knew these things. But he couldn't remember. He couldn't get his words out. This was a strong, proud man who now couldn't even stand without assistance. Just two days after we set up home hospice, John couldn't make it to the bathroom and had an accident. He cried. He kept saying how sorry he was. He always held the family together, and now he was falling apart. He needed assistance to do everything.

13. We lasted two days at home before having to go into a hospice facility. He was suffering, and we couldn't give him the care he needed. We were told that John only had hours to live. It wasn't even hours. He died the same night we took him there. He was told he was cancer-free and died two months later! Maybe John knew he was dying and had resigned himself to that fact. It was a nightmare he couldn't wake up from. I don't think he ever gave up, though. He tried to be strong for his family to the very end.

Sworn to before me this
29 day of June, 2022


Notary Public


BERNADETTE KRISTOFFERSEN

